

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	)	
WILLIAM A. BROWNLEE, SR.,	)	CASE NO.: 24-10598-PMM
	)	CHAPTER 13
DEBTOR,	)	

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

Please take notice that the undersigned hereby enters his appearance as counsel for and on behalf of Eray Guven ("Guven"), creditor in the above-captioned matter, and hereby requests, pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Rules"); and, pursuant to Rules 2002 and 9001 of the Federal Rules of Bankruptcy Procedure and 11 U.S.C. § 342, that copies of all notices and pleadings given or filed in this case be given and served upon the party listed below at the following address and telephone number:

Jillian M. Pratt, Esquire  
3704 Kennett Pike, Suite 200  
Greenville, DE 19807  
(302) 426-1313 (p)  
(302) 426-1300 (f)  
jpratt@mvzllc.com

Please take further notice that the foregoing request includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, any order, notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the referenced case and proceeding herein.

This Notice of Appearance and Request for Service of Papers, and any subsequent appearance, pleading, claim, or suit, shall not be deemed or construed to be a waiver of Guven right: (i) to have final orders in non-core matters entered only after de novo review by a district

judge, (ii) to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto, (iii) to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal, or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which Guven is or may be entitled, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Guven expressly reserves.

Respectfully submitted,

/s/ Jillian M. Pratt

Jillian M. Pratt, Esquire

PA Bar ID 310512

3704 Kennett Pike, Suite 200

Greenville, DE 19807

(302) 426-1313

[jpratt@mvzllc.com](mailto:jpratt@mvzllc.com)

*Attorney for Eray Guven*